

**Hearing Date and Time: April 13, 2011 at 10:00 a.m. (Prevailing Eastern Time)**  
**Objection Deadline: April 8, 2011 at 4:00 p.m. (Prevailing Eastern Time)**

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*Attorney for Giants Stadium LLC*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	
	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	Case No. 08-13555 (JMP)
	:	
Debtors.	:	Jointly Administered
	:	

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**RENEWED LIMITED OBJECTION OF GIANTS STADIUM LLC TO  
THE DEBTORS' MOTION FOR AUTHORIZATION TO ESTABLISH AND  
IMPLEMENT PROCEDURES IN CONNECTION WITH  
DISCOVERY RELATED TO PLAN CONFIRMATION**

Giants Stadium LLC ("Giants Stadium"), by and through its undersigned counsel, submits this Renewed Limited Objection (the "Renewed Limited Objection") to the Debtors' Motion Pursuant to Section 105 of the Bankruptcy Code and Rule 7026 of the Federal Rules of Bankruptcy Procedure for Authorization to Establish and Implement Procedures in Connection with Discovery Related to Plan Confirmation [Docket No. 14867], dated March 8, 2011 (the "Debtors' Discovery Motion").

On April 5, 2011, Giants Stadium filed the Limited Objection of Giants Stadium LLC to the Debtors' Motion for Authorization to Establish and Implement Procedures in Connection with

Discovery Related to Plan Confirmation [Docket No. 15617] (the “Limited Objection”), as that motion related to the Amended Order Establishing Schedule in Connection with Discovery Related to Plan Confirmation and Other Issues [Docket No. 15539], dated March 31, 2011 (the “Amended Proposed Order”).

On April 6, 2011, the Debtors filed the Notice of Second Amended Proposed Order Establishing a Discovery Protocol and Extension of Time for Filing of Objections to Proposed Discovery Protocol [Docket No. 15682], in which they set out a Second Amended Order Establishing Schedule and Procedures in Connection with Discovery Related to Plan Confirmation and Other Issues (the “Second Amended Proposed Order”).

Giants Stadium has reviewed the Second Amended Proposed Order and believes it does not alter the Limited Objection. Accordingly, Giants Stadium herein reaffirms and incorporates its Limited Objection into this Renewed Limited Objection.

Dated: New York, New York  
April 8, 2011

Respectfully submitted,

**SULLIVAN & CROMWELL LLP**

By: /s/  
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